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November 17, 2020

By CM/ECF Posting

The Honorable Mary Kay Vyskocil United States District Court for the Southern District of New York 500 Pearl Street, Room 2230 New York, New York 10007-1312

Re: Shabtai Scott Shatsky, et al. v. The Palestine Liberation Organization, et al., Case No. 18 Civ. 12355 (MKV) (DCF)

Dear Judge Vyskocil:

We represent Plaintiffs in this action. During the pre-motion conference that the Court held on November 6, 2020, Your Honor directed Plaintiffs to file, on or before November 20, 2020, an amended complaint including allegations as to personal jurisdiction over defendants The Palestine Liberation Organization and The Palestinian Authority pursuant to the Promoting Justice and Security for Victims of Terrorism Act, Pub. L. 116-94, div. J, tit. IX, § 903. Since November 6, Plaintiffs have worked diligently toward preparing their amended complaint. However, the allegations Plaintiffs will be adding to their original complaint are substantial, and coordination as to those allegations with Plaintiffs, through their representatives in Israel, has taken longer than anticipated.

Accordingly, with defendants' consent, we respectfully request that the Court extend the deadline for Plaintiffs' filing by three business days, through and including November 25, 2020. There have been no prior requests to extend this deadline.

Thank you for your consideration.

Respectfully submitted,

Stephen M. Sinaiko

Ronald F. Wick



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cc: All Counsel (by CM/ECF Posting)